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State and Tribal Assistance Grants (STAG) 2000-2001
Michigan: Business Needs Assessment and Measurement of Work Product Effectiveness
Final Report
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An Evaluation of Work Product and Program Effectiveness
of the
Michigan Manufacturers' Guide to Environmental, Safety and Health Regulations
and the
Michigan (Small Business) Clean Air Assistance Program

GRANT OVERVIEW

Background

In July of 2000, the (Small Business) Clean Air Assistance Program (CAAP), Environmental Science and Services Division (ESSD - formerly the Environmental Assistance Division or EAD) of the Michigan Department of Environmental Quality received a multi-media State and Tribal Assistance Grant (STAG) from EPA's Office of Compliance and Enforcement Assurance (OECA) in the amount of \$40,000. The grant project, entitled "**Business Needs Assessment and Measure of Work Product Effectiveness**," was to gauge the usefulness of a CAAP work product, the *Michigan Manufacturers' Guide to Environmental, Safety, and Health Regulations*. Grant activities measured limited aspects of the CAAP by examining the effectiveness of their outreach efforts as a technical assistance resource for the state's business and industry. Additional aspects of the grant provided ways in which the CAAP can improve its methods of outreach in order to better serve a greater proportion of its customer base.

A Lansing, Michigan area consulting firm, Public Policy Associates, Inc. (PPA), performed the work product assessment by administering a series of two surveys and two focus group sessions. The first survey was administered to 1,800 program customers who received a copy of the environmental, safety and health guide. The second survey was delivered to a random pool of 3,000 statewide non-customers to determine what needs still exist within the environmental community, and how the program can best meet those needs in the future. Both customer and non-customer surveys were accompanied by a letter from the former Department Director, encouraging the participant to fill out and return the surveys.

Objective

Each aspect of research is expected to provide the Clean Air Assistance Program, its home division, the ESSD, and the MDEQ with information that can be used to retool the program's compliance assistance work products and activities.

Activities

The two focus group forums were held on September 17 and 19, 2002 in Grand Rapids, Michigan and Farmington Hills, Michigan, respectively. A focus group report was generated by PPA in October 2002 generally summarizing the outcomes of the focus group participants.

The Guide's customer survey was administered in December of 2002 and the non-customer survey was administered in early January 2003. Between January and March of 2003, PPA aggregated the data from the customer survey and generated a customer satisfaction report of summary findings. Where appropriate and relevant, PPA attempted to integrate the findings of the two focus groups with the findings of the customer survey. Data from the non-customer survey was also aggregated, and a non-customer business owner summary report of findings was developed in April 2003.

Project Summary

The research findings effectively demonstrated the great value that has been placed on the multi-media guidebook, the *Michigan Manufacturers' Guide to Environmental, Safety, and Health Regulations* by the state's businesses. Most found it to be a very thorough, economical and useful resource for environmental, safety and health issues.

The research, which also measured the use and need of other outreach services delivered by the MDEQ, ESSD and CAAP, showcases the important role that these services play in helping business and industry achieve and maintain environmental, safety and health compliance. It also demonstrated the high satisfactory rating that businesses place on those services currently being rendered by the MDEQ, ESSD and CAAP.

Although current work products and services received high marks under this project, the following details some of the reoccurring themes generated from the responses of the focus groups, customer survey and non-customer survey. These recommendations offer the MDEQ, ESSD and CAAP some constructive models for change. The MDEQ has an on-going commitment to improve its compliance assistance efforts, and will use this information to make enhancements to its environmental outreach programs.

One theme derived from the project's research focused on the improvement of promotional activities of the MDEQ, ESSD and CAAP. Research participants often were unsure of who sponsors certain events, or develops certain guidance documents within the department, and although the CAAP and the ESSD have been around since 1994, each still seems to suffer from a lack of name recognition and the underutilization of available services. One explanation could be derived from the traditional approach to advertising and marketing that takes place with the promotional activities of the MDEQ's products and services: Currently, the MDEQ makes regulatory and compliance information available through its agency calendars, newsletters, mailings, and web site, leaving it up to business and industry to "seek out" the information in order to meet their compliance requirements. This finding was primarily evident in research participant's responses which showed some lack of awareness of the range of products and services offered by the ESSD or CAAP, or in their use of other resources to obtain environmental regulatory information. Research participants encouraged the MDEQ to more clearly distinguish its sponsorship and ownership of specific events and work products.

Another theme revolved around ways in which the MDEQ, ESSD and CAAP can improve its compliance assistance efforts. Those respondents in the research that have utilized work products such as the *Michigan Manufacturers' Guide to Environmental, Safety, and Health Regulations*, seem to be quite pleased overall with the content and format of the Guide, and the fact that the two state agencies were willing to combine their program area expertise to produce a multi-media work product. In fact, participants encouraged additional efforts to combine environmental media requirements such as merging various program reporting requirements

into one form or report, and utilizing more tables, checklists and flow diagrams to quickly outline compliance requirements. One of the research recommendations included employing a department-wide approach, for those programs that could not be tied together, to detail the overlap of these regulations so that contradictions and lack of consistency could be minimized for business and industry. This would require the department to employ a multi-media culture so that there would be a simplified and common approach to compliance assistance outreach.

Research participants also wanted to see the MDEQ bridge the gap between what is expected during an inspection, and the compliance assistance information that is received through consultation or training sessions, so that the information that is provided is applied consistently from region-to-region and between Lansing and the district offices. The findings also pointed out businesses' need for an environmental management structure that would provide them with just the required industry-specific information, making it clear what regulations were applicable, what resources were available, and who (staff persons) to contact when questions arose.

Expanding the methods for the delivery of work products and services was another theme that arose from the research findings. This meant looking at new or easier ways in which to get information out and into the hands of business and industry. Often mentioned was the use of electronic media such as the world wide web, placing environmental compliance information on CD-ROM and the use of e-mail service for updates. Very few research participants seem to currently use the MDEQ web site making it an under utilized resource for compliance assistance. Most found the web difficult to navigate, or had difficulty in downloading information. Respondents hinted that if the web was more manageable, that they would use it more for consultation purposes because it is a convenient and non-threatening method for information delivery.

Finally, the research found that those currently using the services of the MDEQ, ESSD and CAAP sought help mostly to clarify or interpret a regulation or requirement. Additionally, when asked, research participants overwhelmingly subscribed to the belief that environmental regulations were important to Michigan's quality of life. Many respondents indicated their willingness to "do the right thing" when it came to environmental, safety and health compliance, but were always seeking the best economical means in order to accomplish this mission. As the MDEQ, ESSD and CAAP continue to evolve and develop new tools for business and industry to use, it will be important that the focus for outreach remain a balance between usefulness, need, cost and access to a specific work product or service. The research recommendations provided by this project are the starting point for the MDEQ, ESSD and CAAP to begin the necessary, subtle, and programmatic changes that will continue to provide substance and value for future compliance assistance efforts.

Opportunities for Work Product and Services Enhancement

The following represent a series of improvement objectives, based on the research findings, that are designed to provide Michigan's business and industry with more meaningful and effective work products and services. These objectives can be implemented either by the MDEQ as a whole department, through the environmental assistance programs offered through the ESSD, or through the small business assistance program (CAAP). Each objective includes a recommendation for the level of effort that will be required for implementation of a recommendation. Work product and services enhancements are slated to begin as early as October 2003.

Guidebook Improvement

1. *Provide a record of revisions for each edition.*

Level of Effort: Revision tracking would be assigned to each ESSD and MIOSHA staff person in charge of reviewing a specific chapter's content for the next update, and list major changes in program areas since the last edition.

2. *Improve the Facility Assessment Survey located at the front of the Guidebook.*

Level of Effort: Redesigning the Facility Assessment Survey such that it is a stand-alone and noticeable document that represents a complement to the Guidebook's contents.

3. *Provide a direct hyperlink, in the electronic copy of the Guidebook, for web site references.*

Level of Effort: Documentation and inclusion of active web site links would be assigned to each ESSD and MIOSHA staff person in charge of electronically updating a specific chapter's content in the Guidebook. These links would take Guidebook owners directly to program information, a publication or form.

4. *Include more tables, checklists, flow diagrams and graphics.*

Level of Effort: Each ESSD and MIOSHA staff person, in charge of reviewing a specific chapter's content for the next update, can develop additional tables, checklists, flow diagrams, photographs, or include other graphics where appropriate to illustrate principles of compliance.

5. *Develop an environmental reporting "Calendar of Events."*

Level of Effort: Provide a generic list of reporting requirements with due dates for those programs that have a standard annual reporting deadline (i.e. air emission reporting; SARA Title III, Tier Reports; SARA Title III, Toxic Release Inventory; Annual Waste Water Reports, etc.).

Workshop Improvement

1. *Better correlation between contents of Guidebook and workshop presentations.*
2. *Develop compliance workshops similar to what is delivered by MIOSHA's Consultation, Education and Training Division (CET).*

Level of Effort: ESSD, CAAP, and MIOSHA CET staff meet to discuss how CET training is structured and delivered in relation to how regulatory inspections are

completed at each facility. Modifications made to existing training methods based on meeting outcomes.

3. *Develop an annual workshop/training schedule of standard workshops, and training opportunities that will be offered by the MDEQ during the fiscal year.*

Level of Effort: During the annual strategic planning phase for agency programs, develop a calendar of workshops and training sessions for environmental programs that have an ongoing demand, and publish this calendar at the beginning of the fiscal year.

Services Improvement

1. *Bridge the gap between regulatory inspections and what the term “compliance” really means.*

Level of Effort: Deliver more detailed consultation guidance and develop documents that describe how compliance with permit conditions, monitoring or reporting are achieved and maintained by a facility using photographs, diagrams, and best management practices for a pollution source. Guidance documents should conform to each regulatory media’s inspection criteria, so that facility staff fully understand their applicable requirements.

2. *Standardize the interpretation variance in regulatory application between each district office, and between the district offices and Lansing.*

Level of Effort: Develop policy at the division or department level that provides a set of basic guidelines once compliance resolutions are reached for unusual circumstances regarding a pollution source. This policy is then distributed to applicable staff and implemented uniformly. Require that district offices share those interpretations, not written in policy, regarding specific circumstances of application so that consistency is maintained.

3. *Distinguish sponsorship of work products and activities.*
4. *Provide a greater awareness, or establish a “brand name” for products and services by expanding existing advertisement and marketing activities.*

Level of Effort: Begin development or strengthen existing working relationships with non-traditional partners such as county treasury officials; building code inspectors; MIOSHA inspection and training staff; MDEQ staff; state and local economic development agencies; non-profit agencies; real estate, banks and insurance agencies; chambers of commerce and product vendors. Design an advertising and marketing program that allows staff from the MDEQ to promote work products and services through radio interviews, public service announcements, trade shows, annual association conferences, through industry association newsletters, etc.

5. *Provide a more user-friendly and interactive web site, which details a list of experts to call by subject area, and the ability to submit questions anonymously through the web portal.*

Level of Effort: Work with staff from the Michigan Department of Information Technology to revamp existing department web structure and format. Establish a department-wide list of experts for each environmental program area, placing the list in a prominent spot on the department's web site. Add a specific web page that provides a list and way to access each program's regulatory forms. Build a bulletin board system that allows facilities to anonymously post questions and receive answers from each environmental program.

6. *Combine environmental reporting requirements into one report that can be submitted and accepted by each of the department's divisions.*

Level of Effort: Work with program staff in each division of the department to identify all environmental reporting requirements, review and examine current reporting forms for overlap and inconsistency of required information, and develop one interdepartmental form that can be used by facilities to satisfy each reporting requirement.